

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

NOTICE OF CONTINUING CONTEMPT AND POST-JUDGMENT DISCOVERY

Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. (PETA) and Angela Scott (together, “Plaintiffs”), submit this notice to advise the Court that Defendant Tonia Haddix has not complied with its Order of March 27, 2023 [ECF No. 386], and Plaintiffs are pursuing post-judgment discovery in relation to the Order. Plaintiffs further state as follows:

1. On March 27, 2023, the Court granted Plaintiffs’ Motion for Attorney’s Fees and Costs Incurred to Obtain Compliance with the Consent Decree and supplement to that motion, ordering as a civil contempt sanction that Haddix compensate PETA \$224,404.24 for costs so incurred. [ECF No. 386.]
2. Haddix was required to pay PETA or post a bond for the full \$224,404.24 by April 3, 2023. [*Id.*]
3. On April 3, Haddix filed an unopposed motion for a 14-day extension to attempt comply with the Court’s Order [ECF No. 387], which the Court promptly granted [ECF No. 388].

4. As of the conclusion of the extension on April 17, and to date, Haddix has not made any such payment, has not posted any bond, and the parties have been unable to reach an alternative resolution of Haddix's obligations at this time.

5. Accordingly, pursuant to Federal Rule of Civil Procedure 69(a), Plaintiffs intend to proceed with post-judgment discovery in aid of the execution of the Court's Order. *See generally Bricklayers v. MRC Tile*, No. 4:19CV3287 HEA, 2023 WL 2536331, at *1 (E.D. Mo. Mar. 16, 2023) (citing *Credit Lyonnais, S.A. v. SGC Intern., Inc.*, 160 F.3d 428, 430 (8th Cir. 1998)).

Dated: April 20, 2023

Respectfully submitted,

/s/ Jared Goodman
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